

ROBERT (BOB) ROSS;	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 4:22-CV-00343
	§	
ASSOCIATION OF PROFESSIONAL	§	
FLIGHT ATTENDANTS,	§	
MCGAUGHEY, REBER AND	§	
ASSOCIATES, INC. JULIE	§	
HENDRICK AND ERIK HARRIS,	§	
DEFENDANTS	§	

COMES NOW Defendant, McGaughey, Reber and Associates, Inc., by and through counsel, Michael R. Rake, and moves this Court to allow Defendant McGaughey, Reber and Associates more time to respond to Plaintiff's Original Complaint, and in support of said motion, state as follows:

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forwarded the Affidavit of Service by e-mail to the undersigned Attorney.

4. This Defendant requests a 30 day extension, or a lesser time, should the Court chose, to file an Answer.
5. Defendant's Attorney attempted to contact Plaintiff's Attorney, by phone and e-mail to discuss this Motion, but has received no response at this time.

Defendant prays that the Court grant this Motion for extension of time.

Respectfully submitted,

/s/ Michael R. Rake

Michael R. Rake, Attorney at Law

SB # 16487600

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ATTORNEY FOR DEFENDANT,
MCGAUGHEY, REBER AND ASSOCIATES, INC.

Certificate of Service

This certifies that this document was served in accordance with the Federal Rules of Civil Procedure on May 27, 2022.

/s/ Michael R. Rake

Michael Rake

Certificate of Conference

This certifies that Defendant's Attorney attempted a conference with Plaintiff's Attorney of record but was not successful in reaching, Plaintiff's Attorney via phone or e-mail.

/s/ Michael R. Rake

Michael R. Rake

DEFENDANT, MCGAUGHEY, REBER AND ASSOCIATES, INC., MOTION FOR EXTENSION OF TIME TO FILE AN ORIGINAL ANSWER